| 1 | THEODORE PARKER, III, ESQ. | |
|----|---|---|
| 2 | Nevada Bar No. 4716 PARKER, NELSON & ASSOCIATES, CHTD. | |
| 3 | 2460 Professional Court, Suite 200 Las Vegas, Nevada 89128 Telephone: (702) 868-8000 Facsimile: (702) 868-8001 Email: Tparker@pnalaw.net F. TRAVIS BUCHANAN, ESQ. Nevada Bar No. 9371 F. TRAVIS BUCHANAN, ESQ. & ASSOCIATES, PLLC 701 E. Bridger Avenue, Suite 540 Las Vegas, Nevada 89101 | |
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| 11 | Attorneys for Plaintiffs | |
| 12 | UNITED STATES DISTRICT COURT | |
| 13 | DISTRICT OF NEVADA | |
| 14 | * * * | |
| 15 | PARENT DOE, individually, and JOHN | Case No. 2:15-cv-00793-APG-GWF |
| 16 | DOE, individually, | |
| 17 | Plaintiffs, | STIPULATION AND ORDER TO EXTEND TIME TO FILE JOINT PRE- |
| 18 | | TRIAL ORDER |
| 19 | CLARK COUNTY SCHOOL DISTRICT; | (SECOND REQUEST) |
| 20 | ERIN WING; JEANNE DONADIO | |
| | Principal, in her Official and Individual Capacities; JOHN DOES I-X, inclusive; | |
| 21 | and | |
| 22 | ROE CORPORATIONS I-X, inclusive, | |
| 23 | Defendants. | |
| 24 | COME NOW the parties, by and through their counsel of record, and hereby submit the | |
| 25 | instant Stipulation and Order to Extend Time to file Joint Pre-Trial Order. The parties request the | |
| 26 | current deadline of March 12, 2018, be extended 21-days up to April 2, 2018. | |
| 27 | On January 11, 2018, this Court issued its Order Granting in part and Denying in part | |
| 28 | Defendant's Motion for Summary Judgment. | In light of various causes of action being dismissed 1 |

from the action, 6 months after the original July 6, 2017 due date for the Joint Pre-Trial Order, the requested extension will allow the parties time to streamline their witness and exhibit lists, and continue their discussions re: the applicability of various state tort damage caps to the remaining causes of action. While the parties are continuing to work to prepare and submit the Joint Pre-Trial Order, the parties' ongoing discussions concerning the applicability of various state tort damage caps to Plaintiffs' surviving claims, might assist the parties with case evaluation and settlement negotiations. The parties are requesting that this Court extend the time to file the Joint Pre-Trial Order while the parties attempt to resolve their positions on the applicable damage caps and counsel to finalize drafting a proposed Order for the claims allowed to proceed by the Court. Specifically, the parties request a three-week extension of the time to file the Joint Pre-Trial Order, extending the deadline until April 2, 2018. This request is made in good faith and not as an attempt to needlessly delay these proceedings. DATED this 5th day of March, 2018. PARKER, NELSON & ASSOCIATES, CLARK COUNTY SCHOOL DISTRICT CHTD.

/s/ Theodore Parker III

THEODORE PARKER, III, ESQ.

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Attorneys for Plaintiffs

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

/s/ S. Scott Greenberg

Nevada Bar No. 4622

5100 W. Sahara Avenue

Las Vegas, Nevada 89146

Attorneys for Defendants

S. SCOTT GREENBERG, ESQ.

Dated: March 6, 2018

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